

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

WOODMEN OF THE WORLD LIFE  
INSURANCE SOCIETY, a Nebraska Not for  
Profit Fraternal Benefit Society,

Plaintiff,

v.

U.S. BANK NATIONAL ASSOCIATION;  
U.S. BANCORP ASSET MANAGEMENT,  
INC., f/k/a FAF ADVISORS, INC. a Delaware  
Corporation; U.S. BANCORP, a Delaware  
Corporation; and EMIL C. BUSSE, JR.,

Defendants.

Civil Case No. 8:09-cv-00407V  
(JBF/TDT)

**DEFENDANT EMIL C. BUSSE,  
JR.'S EXPEDITED MOTION FOR  
LEAVE OF COURT TO SERVE  
ADDITIONAL  
INTERROGATORIES AND TO  
COMPEL ANSWERS TO  
INTERROGATORIES AND  
RESPONSES TO REQUEST FOR  
DOCUMENTS DIRECTED AT  
WOODMEN**

TO: PLAINTIFF ABOVE-NAMED AND ITS ATTORNEYS, PATRICK G. VIPOND, ESQ., MARK NOVOTNY, ESQ., CATHY TRENT-VILIM, ESQ., LAMSON, DUGAN AND MURRAY, LLP, 10306 REGENCY PARKWAY DRIVE, OMAHA, NE 68114-3743 AND DEFENDANTS U.S. BANK NATIONAL ASSOCIATION; U.S. BANCORP ASSET MANAGEMENT, INC., F/K/A FAF ADVISORS, INC., A DELAWARE CORPORATION; U.S. BANCORP, A DELAWARE CORPORATION AND ITS ATTORNEYS STEVE W. GASKINS, NICHOLAS ROGERS, SARA H. DAGGETT, ROBERT W. VACCARO, GASKINS BENNETT BIRRELL SCHUPP, L.L.P., 333 SOUTH 7<sup>TH</sup> STREET, SUITE 2900, MINNEAPOLIS, MN 55402.

Defendant, Emil C. Busse, Jr. ("Busse"), pursuant to Fed. R. Civ. P. 26(b)(2), 33(a) and 37, hereby seeks leave of Court to serve additional interrogatories and to compel answers and responses to written discovery directed at Plaintiff Woodmen of the World Life Insurance Society. This motion is based on Busse's Index of Evidence Supporting this motion; the Affidavit of Robert J. Hennessey dated April 2, 2012 with Exhibits A-D; and, supporting Memorandum of Law.

Dated: April 2, 2012

**LINDQUIST & VENNUM PLLP**

By /s/ Robert J. Hennessey  
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**COUNSEL FOR DEFENDANT  
EMIL C. BUSSE, JR.**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of April, 2012, a true and accurate copy of the foregoing document was served upon the following via first class U.S. Mail, postage prepaid:

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/s/ Robert J. Hennessey  
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